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8
9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION

11 VASUMATHI VIJAYRAGHAVEN,
aka Vasu Vijayraghavan

12 Plaintiff,

13 v.

14 RIVERSIDE COUNTY DISTRICT
15 ATTORNEYS' OFFICE; RIVERSIDE
SHERIFFS DEPARTMENT;
16 MICHAEL A. HESTRIN, DA,
individually; JOSEPH A.
17 HERNANDEZ, DDA, individually;
HEATHER D. FERRIS, DDA,
18 individually; KATHERINE COHAN;
DEPUTY ORRIS, individually And
19 Does 1 through 100;

20 Defendants.

CASE NO. 5:23-00683-SSS-DTBx

DEFENDANT KATHERINE
COHAN'S MOTION FOR
JUDGMENT ON THE PLEADINGS
AS TO PLAINTIFF VASUMATHI
VIJAYRAGHAVEN'S FIRST
AMENDED COMPLAINT
PURSUANT TO FEDERAL RULES
OF CIVIL PROCEDURE, RULES
12(c) AND 12(b)(1)

Date: March 22, 2024_

Time: 2:00 p.m.

Dept.: 2

[Filed Concurrently With Declaration
of William Sorkin]

21
22
23 TO THE ABOVE-ENTITLED COURT AND TO ALL PARTIES AND
24 THEIR ATTORNEYS OF RECORD HEREIN:

25 PLEASE TAKE NOTICE THAT on March 22, 2024 at 2:00 p.m. or as
26 soon thereafter as this matter may be heard in Department "2" of the above-entitled
27 Court located at 3470 Twelfth Street, Riverside, California 92501, defendant
28 KATHERINE COHAN (hereinafter "defendant") will and hereby does move,

pursuant to Federal Rules of Civil Procedure (hereinafter "FRCP"), Rules 12(c) and 12(b)(1) for judgment on the pleadings as to plaintiff VASUMATHI VIJAYRAGHAVEN's (hereinafter "plaintiff") first amended complaint (hereinafter "FAC") and her purported counts therein for defamation per se, intentional infliction of emotional distress, wrongful arrest, gross negligence, forgery, conspiracy to commit forgery, fraud, conspiracy to commit fraud, intentional interference with prospective business advantage, violation of California Business & Professions Code §6067, and civil extortion (hereinafter "motion").

This motion is based on the fact that plaintiff cannot as a matter of law meet her burden of establishing that she has sufficiently pled any of her purported counts against defendant.

This motion is made after the telephonic conference between plaintiff and defendant's counsel pursuant to Local Rule 7-3, which took place on February 9, 2024. Declaration of William G. Sorkin filed herewith, ¶3 and Exhibit "A."

This motion is further based upon this notice of motion, the attached memorandum of points and authorities, the declaration of William G. Sorkin filed concurrently herewith, all documents and matters which this Court can take judicial notice of, all pleadings and documents in this action, and upon such argument, evidence, and documents as may be presented before or at the hearing on this motion.

DATE: February 23, 2024

YEE & ASSOCIATES

By: 

STEVEN R. YEE

Attorneys for Defendant **KATHERINE COHAN**

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION AND FACTUAL BACKGROUND

Plaintiff's FAC is an improper shotgun style pleading in which she alleges that a non-party, defendant, and numerous members of the Riverside Sheriff's Department and District Attorney's Office all somehow conspired against plaintiff in order to have her falsely arrested.

Plaintiff's relevant allegation against defendant is that defendant and her former client Alejandro Odeh-Lara purportedly conspired to forge a filing by plaintiff about an expert who had previously been retained by plaintiff and Mr. Odeh-Lara (not defendant). FAC, ¶161. Plaintiff sets forth absolutely no proper pleading about defendant was allegedly involved in this purported forgery, other than defendant's alleged statement that it was her belief that plaintiff filed the document herself. FAC, ¶159. This does not establish conspiracy to commit forgery.

Plaintiff falsely claims that defendant "complained to the DA's office a complaint that she knew to be false" which led to plaintiff's alleged wrongful arrest. FAC, ¶143. However, plaintiff has removed all factual allegations from the beginning of her FAC with regard to her allegation that defendant conspired with Odeh-Lara to have plaintiff arrested. Compare plaintiff's complaint on file herein, ¶47 with FAC on file herein, ¶¶53-57. Instead, the only possible reference to defendant in the "factual allegations" portion of the FAC which relate to plaintiff's arrest is the inclusion of "Odeh/Cohan" in paragraph 58. In purported support of this claim, plaintiff attaches the criminal complaint against her, the declaration in support of the arrest warrant, and the transcript for Mr. Odeh-Lara's interview. FAC, Exhibit "II". However, the only references to defendant in any of these documents are that plaintiff is accused of threatening great bodily harm to defendant, an allegation which was made by Mr. Odeh-Lara, not by defendant. FAC, Exhibit "II," Count 2 and FAC (Bates stamped 000246) (plaintiff's exhibits

to her FAC are not consistently labeled). The declaration in support of the arrest warrant specifically states that the requesting officer, defendant Deputy Orris, only spoke with Mr. Odeh-Lara. FAC, Exhibit "6," form RI-CR040, pp. 1 and 2. Deputy Orris' declaration does not state that he had any communications with defendant or relied on defendant in any way.

Finally, plaintiff incredulously alleges that defendant is somehow responsible for a "felony alert" on plaintiff's State Bar Profile. Again, plaintiff alleges that this "felony alert" resulted from her incorrect claim that defendant allegedly filed a police report against her. FAC, ¶143. Plaintiff does not allege that this ever occurred.

II. STANDARDS APPLICABLE TO AN FRCP, RULE 12(c) MOTION

A motion for judgment on the pleadings can be made at any time "[a]fter the pleadings are closed—but early enough not to delay trial. FRCP, Rule 12(c). A motion for judgment on the pleadings uses the standards as a FRCP Rule 12(b)(6) motion to dismiss. Gregg v. Dep't of Public Safety (9th Cir. 2017) 870 F.3d 883, 887.

In order to defeat a motion under either 12(b)(6) or 12(c), plaintiff must "plead 'enough facts to state a claim to relief that is plausible on its face.'" Bell Atl. Corp. v. Twombly (2007) 55 U.S. 554 570). The complaint does not "suffice if it tenders 'naked assertion[s]' devoid of 'further factual enhancement.'" Ashcroft v. Iqbal (2009) 556 U.S. 662, 678 (quoting Twombly, 550 U.S. at p. 556). "A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged." Id.

A motion to dismiss based on the Court lacking subject matter jurisdiction (Rule 12(b)(1)) can be raised at any time. Henderson v. Shinseki (2011) 562 U.S. 428, 435.

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1 **III. PLAINTIFF CANNOT SUE DEFENDANT FOR WRONGFUL**
 2 **ARREST**

3 Wrongful arrest is actually the tort of false imprisonment. 5 Witkin,
 4 Summary of California Law, supra, Torts, §378, at pp. 463 and 464.

5 In order to establish her claim for false imprisonment, plaintiff must prove
 6 that defendant intentionally caused plaintiff to be wrongfully arrested. Peters v.
 7 Bigelow (1934) 137 Cal.App.135, 139. However, false imprisonment **only** applies
 8 if “the plaintiff is arrested pursuant to a procedurally improper warrant or
 9 warrantless arrest.” Cummings v. Fire Ins. Exchange (1988) 202 Cal.App.3d 1407,
 10 1422. If defendant “procur[ed] the prosecution of another under lawful process,
 11 but from malicious motives and without probable cause,” the proper cause of
 12 action is malicious prosecution. Cox v. Griffin (2019) 34 Cal.App.5th 440, 448.

13 Plaintiff admits that there was a warrant for her arrest and noticeably does
 14 not allege that her arrest warrant was defective in any way. To the contrary,
 15 plaintiff pleads in her purported count for wrongful arrest that “[d]efendants caused
 16 plaintiff to be wrongfully arrested with no probable cause.” FAC, ¶146.

17 Because plaintiff cannot sue defendant for wrongful arrest, this Court must
 18 grant defendant’s motion to dismiss plaintiff’s 11th count for wrongful arrest
 19 without leave to amend.

20 **IV. PLAINTIFF CANNOT MAINTAIN HER COUNT FOR VIOLATION**
 21 **OF CALIFORNIA BUSINESS AND PROFESSIONS CODE §6067**
 22 **BECAUSE IT DOES NOT PROVIDE THE RIGHT TO A PRIVATE**
 23 **ACTION**

24 California Business & Professions Code §6067 provides as follows:

25 “Every person on his admission shall take an oath to
 26 support the Constitution of the United States and the
 27 Constitution of the State of California, and faithfully to
 28 discharge the duties of any attorney at law to the best of

his knowledge and ability. A certificate of the oath shall
be indorsed upon his license.”

California Business & Profession Code §6067 does **not** provide for the right
to a private cause of action. Petersen v. Browne (Northern District of California
2013) 2013 WL 211136 at p. 8. Accordingly, this Court must dismiss plaintiff’s
purported count for violation of California Business & Professions Code §6067
without leave to amend.

V. **PLAINTIFF CANNOT MAINTAIN PURPORTED COUNTS FOR
WRONGFUL ARREST, DEFAMATION PER SE, INTENTIONAL
INFLECTION OF EMOTIONAL DISTRESS, GROSS NEGLIGENCE,
OR INTENTIONAL INTERFERENCE WITH A PROSPECTIVE
ECONOMIC ADVANTAGE BECAUSE THE EXHIBITS TO
PLAINTIFF’S FAC UNEQUIVOCALLY ESTABLISH THAT
DEFENDANT WAS NOT RESPONSIBLE AT ALL FOR PLAINTIFF
BEING ARRESTED**

Plaintiff’s purported counts for wrongful arrest, defamation per se,
intentional infliction of emotional distress, gross negligence, and intentional
interference with a prospective economic advantage against defendant all arise
from her claim that defendant “knowingly complained to the DA’s office a
complaint that she knew to be false.” FAC, ¶143. However, the declaration in
support of the arrest warrant (Exhibit “II” to plaintiff’s FAC) unequivocally
establishes that the basis for plaintiff’s arrest was a complaint that was made by
someone else, **not** by defendant. Defendant Deputy Orris attests under penalty of
perjury that the arrest warrant was based on the following:

“I was dispatched to a call of a violation of a civil
harassment order at 11063 Silver run, Moreno Valley,
CA 92557. The reporting party (RP), **Alejandro Odeh**
Lara told dispatch he was receiving physical mail from

1 Vasumathi Vijayraghavan. Odeh-Lara told dispatch that
 2 he has a civil harassment order with Vasumathi as the
 3 restrained party and himself as the protected party . . .”
 4 FAC, Exhibit “II,” pp. 3-4. (Emphasis added).

5 Deputy Orris did **not** state that he ever spoke with or relied on any
 6 communications with defendant in determining whether to arrest plaintiff. Plaintiff
 7 does **not** plead in her FAC that the arrest warrant and charges against her were
 8 based on anything other than Deputy Orris’ declaration. In addition, the transcript
 9 for the DA’s office’s interview of Mr. Odeh-Lara unequivocally establishes that
 10 defendant was **not** involved at all in the DA’s office’s decision to charge plaintiff.
 11 Since plaintiff’s claims arise from her actual arrest, only conduct which
 12 contributed to her arrest is relevant. Cox v. Griffin (2019) 34 Cal.App.5th 440,
 13 448. “The court need not . . . accept as true allegations that contradict matters
 14 properly subject to judicial notice or by exhibit. Nor is the court required to accept
 15 as true allegations that are merely conclusory, unwarranted deductions of fact, or
 16 unreasonable inferences.” Sprewell v. Golden State Warriors (9th Cir. 2001) 266
 17 F.3d 979, 984. Because plaintiff’s conclusory claims that her arrest was based on
 18 statements by defendant are completely contradicted by the exhibits to **her** FAC,
 19 they must be completely disregarded by this Court. This Court must therefore
 20 grant defendant’s motion to dismiss plaintiff’s counts for defamation per se,
 21 intentional infliction of emotional distress, wrongful arrest, gross negligence, and
 22 interference with a prospective economic advantage without leave to amend.

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VI. **PLAINTIFF CANNOT MEET HER BURDEN ON HER PURPORTED COUNTS FOR FORGERY, CONSPIRACY TO COMMIT FORGERY, FRAUD, CONSPIRACY TO COMMIT FRAUD, AND CIVIL EXTORTION BECAUSE THIS COURT DOES NOT HAVE JURISDICTION TO HEAR THEM**

Plaintiff does **not** assert any purported counts against defendant which are based on federal law. Each allegation against defendant is a state law claim for which plaintiff claims that this Court has supplemental jurisdiction. FAC, ¶1.

28 U.S.C. §1367(a) provides as follows:

Except as provided in subsections (b) and (c) or as expressly provided otherwise by Federal statute, in any civil action of which the district courts have original jurisdiction, the district courts shall have supplemental jurisdiction over all other claims that **are so related to claims in the action within such original jurisdiction that they form part of the same case or controversy** under Article III of the United States Constitution. Such supplemental jurisdiction shall include claims that involve the joinder or intervention of additional parties. (Emphasis added).

Plaintiff's counts for forgery, fraud, and civil extortion are completely unrelated to her claims arising from her purported wrongful arrest. Plaintiff alleges that she was arrested as a result of a text message that she sent to Mr. Odeh-Lara, which placed her in violation of Mr. Odeh-Lara's restraining order against her. FAC, ¶57. To the contrary, plaintiff's forgery and fraud allegations are based on her allegation that either Mr. Odeh-Lara or defendant "forged Plaintiff's signature on a fraudulent fax of September 14, 2020, and instead blamed Plaintiff for her own acts of forgery," FAC, ¶159.

1 Plaintiff's purported count for civil extortion is based on defendant's
 2 settlement negotiations with the Bradburys in a California State civil action. FAC,
 3 ¶182.

4 Based on the allegations in plaintiff's FAC and the exhibits to it (in
 5 particular Exhibit "6"), these are entirely unrelated actions which do not form the
 6 same case or controversy. Plaintiff has improperly included her unrelated state law
 7 claims against defendant in this action. Setting aside plaintiff's improper
 8 incorporation of all of her allegations into each of her purported counts, plaintiff
 9 makes no attempt at all to disguise the fact that her forgery, fraud, and civil
 10 extortion counts are entirely unrelated to her federal wrongful arrest counts.
 11 Because this Court does not have jurisdiction over plaintiff's fraud, forgery, or
 12 civil extortion counts, this Court must dismiss these counts without leave to
 13 amend.

14 **VII. PLAINTIFF CANNOT MEET HER BURDEN ON HER PURPORTED**
 15 **COUNTS FOR FRAUD AND CONSPIRACY TO COMMIT FRAUD**
 16 **AGAINST DEFENDANT BECAUSE PLAINTIFF HAS FAILED TO**
 17 **PROPERLY PLEAD ALL OF THE ELEMENTS OF EITHER**
 18 **COUNT**

19 "A complaint for fraud must allege the following elements: (1) a knowingly
 20 false representation by the defendant; (2) an intent to deceive or induce reliance;
 21 (3) justifiable reliance by the plaintiff; and (4) resulting damages." Service by
 22 Medallion, Inc. v. Clorox Co. (1996) 44 Cal.App.4th 1807, 1816.

23 Plaintiff's fraud allegation against defendant solely arises from her claim
 24 that either defendant or Mr. Odeh-Lara purportedly forged a document that was
 25 completely unrelated to plaintiff's arrest. FAC, ¶163. Plaintiff does **not** plead that
 26 she, let alone any other person, justifiably relied upon defendant's purported
 27 conduct. In fact, plaintiff specifically pleads that "it was evident" that the alleged
 28 fraudulent conduct was false, which means that no person, let alone plaintiff, could

1 have justifiably relied on it. FAC, ¶34.

2 In addition, by failing to plead that any person justifiably relied upon
3 defendant's purported conduct, plaintiff also fails to allege that she was damaged
4 in any way by the purported fraud. To the extent that plaintiff claims that she that
5 she suffered some alleged harm with regard to the purported fraud elsewhere in her
6 FAC, it is an unclear and improper shotgun pleading. Weiland v. Palm Beach
7 County Sheriff's Office (11th Cir. 2015) 792 F.3d 1313, 1321-1323.

8 Plaintiff's purported counts for fraud and conspiracy to commit fraud must
9 thus be dismissed without leave to amend.

10 **VIII. PLAINTIFF CANNOT MEET HER BURDEN ON HER PURPORTED**
11 **COUNTS FOR FORGERY AND CONSPIRACY TO COMMIT**
12 **FORGERY BECAUSE THEY ARE NOT INDEPENDENT COUNTS**

13 Plaintiff improperly asserts that two of her purported counts are for forgery
14 and conspiracy to commit forgery. However, forgery is **not** an independent count.
15 Vlasich v. Fishback (E.D. 2007) U.S. Dist. LEXIS 64892, *14. Instead, forgery is
16 a theory for a separate cognizable claim. Kraif v. Guez (C.D. 2010) U.S. Dist.
17 LEXIS 156585, *5.

18 The only purported counts that plaintiff's forgery claims could possibly fit
19 into is her purported counts for fraud. However, as set forth herein, plaintiff has
20 failed to properly plead fraud as a matter of law. This Court must accordingly
21 dismiss plaintiff's purported counts for forgery and conspiracy to commit forgery
22 without leave to amend.

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IX. **REGARDLESS OF THE FACT THAT FORGERY IS NOT AN INDEPENDENT COUNT, PLAINTIFF'S PURPORTED COUNTS FOR FORGERY AND CONSPIRACY TO COMMIT FORGERY ARE INTERNALLY CONTRADICTORY AND ARE NOT PLAUSIBLY PLED**

Allegations in a complaint only comply with FRCP, Rule 8 when they "contain sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face." Ashcroft v. Iqbal (2009) 556 U.S. 662, 678 (quoting Bell Atl. Corp. v. Twombly (2007) 550 U.S. 544, 570). (Internal quotations omitted).

A complaint is not plausible on its face when it contains contradictory allegations. Hernandez v. Select Portfolio Servicing, Inc. (C.D. 2015) 2015 U.S. Dist. LEXIS 82922, at *24.

Here, plaintiff claims that the forged document "bear[s] all of the modus operandi of Odeh." FAC, ¶34. Plaintiff also alleges that not only did Mr. Odeh-Lara commit the forgery, but defendant purportedly knew that Mr. Odeh-Lara committed the forgery. Id. Despite this, plaintiff alleges that "Cohan forged Plaintiff's signature on the fraudulent fax of September 14, 2020." FAC, ¶159. Plaintiff contradicts this new claim in her purported count for conspiracy to commit forgery by alleging that defendant "conspired with Odeh to [forge the September 14, 2020 fax]." FAC, ¶161.

Plaintiff attempts to disguise her contradictory pleadings by alleging that defendant was somehow purportedly involved in a conspiracy with Mr. Odeh-Lara. However, in order for conspiracy to be plausibly pled, plaintiff must plead "more than conclusory allegations of the conspiracy." S. Union Co. v. Southwest Gas Corp. (D. Ariz. 2001) 165 F.Supp.2d 1010, 1020 (which applied California civil conspiracy law). Because plaintiff's conspiracy allegations are completely conclusory and are not plausibly pled, plaintiff's counts for forgery and conspiracy to commit forgery must be dismissed.

**X. PLAINTIFF’S PURPORTED COUNT FOR CIVIL EXTORTION
FAILS BECAUSE PLAINTIFF DOES NOT HAVE STANDING TO
BRING IT**

Plaintiff does not allege that defendant extorted her. Plaintiff also does not allege that she was harmed by defendant’s alleged extortion. To the contrary, plaintiff alleges that “[i]n the present case, Defendant Cohan extorted a dismissal by the Bradburys under threat, duress, ‘unleashing bulldog attorneys against them’ and created fear by the Bradburys, ultimately leading to their dismissal of their case the very day they could have defaulted Cohan.” FAC, ¶182. Because plaintiff is not the person who is allegedly being extorted or the person the alleged extortion is threatened to harm, plaintiff does not have standing to bring this count. Malin v. Singer (2013) 217 Cal.App.4th 1283, 1299. It must therefore be dismissed.

**XI. PLAINTIFF’S PURPORTED COUNT FOR CIVIL EXTORTION
FAILS AS A MATTER OF LAW BECAUSE DEFENDANT’S
ALLEGED CONDUCT IS COMPLETELY PROTECTED BY THE
LITIGATION PRIVILEGE**

The litigation privilege “applies to any communication (1) made in judicial or quasi-judicial proceedings; (2) by litigants or other participants authorized by law; (3) to achieve the objects of the litigation; and (4) that have some connection or logical relation to the action.” Silberg v. Anderson (1990) 50 Cal.3d 205, 212. All of plaintiff’s allegations in paragraphs 44, 45, 46, 180, 181, 182, and 183 in her FAC clearly “have some connection or logical relation to the action.” In addition, a settlement demand only constitutes civil extortion when the conduct alleged is “so extreme in its demands that it constituted criminal extortion as a matter of law.” Malin, supra, 217 Cal.App.4th at p. 1299. Threatening to file a malicious prosecution action (which can only be filed by a prevailing party) is not criminal extortion. Accordingly, plaintiff’s purported count for civil extortion is completely

1 barred by the litigation privilege.

2 **XII. DEFENDANT HAS FULLY COMPLIED WITH THE MEET AND**
3 **CONFER REQUIREMENT AND WAS UNABLE TO RESOLVE**
4 **THESE MOTIONS WITH HER MEET AND CONFER**

5 On February 9, 2024 counsel for defendant and plaintiff **telephonically** met
6 and conferred and defendant's counsel explained in detail the grounds for this
7 motion. Declaration of William G. Sorkin filed herewith, ¶3 and Exhibit "A." The
8 parties were unable to resolve their dispute regarding plaintiff's FAC despite their
9 telephonic meet and confer. Id. Defendant was thus forced to file this motion.

10 **XIII. CONCLUSION**

11 Based on the foregoing, this Court must dismiss plaintiff's entire FAC with
12 prejudice.

13
14 DATE: February 23, 2024

YEE & ASSOCIATES

15
16
17 By: 

STEVEN R. YEE

Attorneys for Defendant **KATHERINE**
COHAN

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 3452 East Foothill Boulevard, Suite 1000, Pasadena, California 91107-6033.

On February 23, 2024, I served the foregoing document described as **DEFENDANT KATHERINE COHAN'S MOTION FOR JUDGMENT ON THE PLEADINGS AS TO PLAINTIFF VASUMATHI VIJAYRAGHAVEN'S FIRST AMENDED COMPLAINT PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE, RULES 12(c) AND 12(b)(1)** on all interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as stated on the **ATTACHED SERVICE LIST**.

() **BY MAIL** as follows:

() **STATE** - I am "readily familiar" with Yee & Associates' practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Pasadena, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

() **FEDERAL** - I deposited such envelope in the U.S. Mail at Pasadena, California with postage thereon fully prepaid.

(X) **BY EMAIL OR ELECTRONIC TRANSMISSION** as follows: Based on an agreement between the parties and/or pursuant to California Rules of Court Rule 2.251(c)(3) and/or pursuant to Judicial Council Emergency Rule 12 contained within Appendix I of Emergency Rules related to COVID-19 and all other applicable law, I caused the document(s) to be sent from the email address cjm@yeelaw.com to the persons at the email addresses listed in the service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

() **BY PERSONAL SERVICE** as follows: I caused a copy of such documents to be delivered by hand to the offices of the addressee between the hours of 9:00 a.m. and 5:00 p.m.

() **BY OVERNIGHT COURIER SERVICE** as follows: I caused such envelope to be delivered by overnight courier service to the offices of the addressee. The envelope was deposited in or with a facility regularly maintained by the overnight courier service with delivery fees paid or provided for.

() **BY FACSIMILE** as follows: I caused such documents to be transmitted to the telephone number of the addressee listed above, by use of facsimile machine telephone number (626) 449-8009. The facsimile machine used complied with California Rules of Court, Rule 2004 and no error was reported by the machine. Pursuant to California Rules of Court, Rule 2006(d), a transmission record of the transmission was printed.

() **FOR REPLY OR OPPOSITION PAPERS:** The foregoing Reply or Opposition papers were also transmitted to the telephone number of the addressee listed above, by use of facsimile machine telephone number (626) 449-8009, consistent with the provisions of Cal. Civ. Proc. Code Sections 1010, 1011, 1012, and 1013, and said transmission was reasonably calculated to ensure delivery to all other interested parties to the within action not later than the close of the next business day after the date the foregoing Reply or Opposition papers were filed, pursuant to Cal. Civ. Proc. Code Section 1005(b). The facsimile machine used complied with California Rules of Court, Rule 2004, no error was reported by the machine, and a transmission record of the transmission was printed.

(X) **STATE** - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

() **FEDERAL** - I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on **February 23, 2024**, at Pasadena, California.


Casey Muller-Bonnell

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SERVICE LIST
Vasumathi Vijayraghavan v. Riverside County District Attorneys Office, et al.
United States District Court for the Central District of
California Civil Action No.: 5:23-CV-00683-SSS-KK
File No.: 1242-160

<p>Vasumati Vijayraghavan 1968 S. Coast Highway #169 Laguna Beach, CA 92651 Office: (619) 517-4563 vvijay081@gmail.com</p> <p>PLAINTIFF IN PRO PER</p>	<p>Douglas C. Smith, Esq. John R. Byerly Smith Law Offices, LLP 4001 Eleventh Street Riverside, CA 92501 dsmith@smitlaw.com jbyerly@smitlaw.com</p> <p>ATTORNEY FOR DEFENDANTS COUNTY OF RIVERSIDE (erroneously sued herein as RIVERSIDE COUNTY DISTRICT ATTORNEY'S OFFICE), MICHAEL A. HESTRIN, DA, JOSEPH M. HERNANDEZ, DDA, AND HEATHER D. FERRIS, DDA</p>
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